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## **FACT SHEET FOR A HAZARDOUS WASTE PERMIT REISSUANCE AND REMEDY SELECTION**

**CHS Laurel Refinery  
803 Highway 212 S.  
Laurel, Montana 59044-0909  
EPA ID Number MTD006238083  
Draft Permit Number MTHWP-14-02**

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The Montana Department of Environmental Quality (DEQ) is soliciting public comment on reissuance of a hazardous waste permit to CHS Inc. (CHS) for the CHS Laurel Refinery. The draft permit is being issued under Title 75, Chapter 10, Part 4, of the Montana Hazardous Waste Act. DEQ is also requesting comment on remedy selection for final cleanup of the facility and environmental assessments of DEQ's actions on the permit reissuance and remedy selection.

### **FACILITY DESCRIPTION**

The Laurel Refinery is south of the city of Laurel, Montana (Figure 1) and has been in operation since the 1930s. Previous owners include the Independent Refining Company, Farmers Union Central Exchange Inc. (Cenex Inc.), and, currently, CHS Inc. (originally named Cenex Harvest States Cooperatives). Refinery operations are conducted on approximately 100 of 350 acres owned by CHS, all of which are zoned for heavy industrial use. The remaining acreage consists of administrative offices and green space. Adjacent property use is residential, light industrial, and agricultural. The Yellowstone River borders a portion of the southern property boundary.

Two land treatment units were used to treat refinery wastes from 1965 to 1988. The State of Montana issued a hazardous waste permit to CHS for closure and post-closure maintenance of the units in 1991. The permit was reissued in 2002. Permit requirements for the two land treatment units included operation and maintenance, closure, post-closure care, and groundwater monitoring. CHS closed one land treatment unit in 2006 to standards which do not require post-closure care. The second land treatment unit was designated as a Corrective Action Management Unit in the 2002 permit, which allowed land treatment of remediation wastes generated as a result of facility-wide cleanup activities. CHS, to date, has not used the land treatment unit to treat remediation waste. A barrier wall and recovery wells were installed at the downgradient edge of the second land treatment unit to address groundwater contamination.

Facilities that have been issued a hazardous waste permit are also required to cleanup releases of hazardous wastes and hazardous constituents to environmental media (i.e. soil, groundwater). CHS must investigate and remediate contaminated media found at the refinery, as well as any contamination that has migrated off-site. Results of remedial investigations conducted by CHS indicate that volatile organic compounds, polycyclic aromatic hydrocarbons, and metals are the main constituents of concern in soils and groundwater. A remedy for site-wide cleanup is being proposed as part of the permit reissuance.

CHS has implemented interim corrective measures to address contaminated groundwater within the refinery and at the refinery property boundary to prevent off-site migration. Interim measures include oil skimming, groundwater recovery and treatment, air sparging, and chemical oxidation.

Montana hazardous waste permits are in effect for 10 years and may be reissued at the end of that time. In February 2012, CHS submitted an application for a second reissuance of its hazardous waste permit. The application was submitted within the regulatory timeframe and, after review, deemed complete by DEQ.

The proposed reissuance will require closure and post-closure care of the inactive land treatment unit and continued remedial action to address contaminated environmental media.

#### **DRAFT PERMIT MTHWP-14-02**

The proposed draft permit for the Laurel Refinery includes the following conditions for the inactive land treatment unit and continued remediation activities:

##### Inactive Land Treatment Unit

- Closure and post-closure maintenance.
- Continued groundwater monitoring.
- Continued corrective measures to address groundwater contamination.

##### Facility-Wide Corrective Action

- Implementation of corrective measures as described in the final Statement of Basis.
- Notification, remedial investigation, and cleanup of any new releases.
- Certification when cleanup measures have been completed.

#### **PROPOSED REMEDY SELECTION**

DEQ has prepared a Statement of Basis to describe DEQ's preferred remedy for contamination found at the Laurel Refinery. DEQ is proposing a combination of corrective measures to address contamination. Excavation combined with ex-situ treatment or disposal, and capping are proposed remedies for contaminated soils. Proposed remedies for contaminated groundwater include air sparging, oil skimming, groundwater recovery and treatment, and monitored natural attenuation. Land use controls and business safety practices are proposed to prevent potential contaminant exposures to current and future on-and off-site workers, and to current and future off-site residents.

DEQ will select the remedy for the Laurel Refinery only after the public comment has ended and all comments are reviewed and considered.

## ENVIRONMENTAL ASSESSMENTS

Environmental assessments have been prepared for the permit reissuance and remedy selection in accordance with the Montana Environmental Policy Act. The environmental assessments document all reasonable alternatives to DEQ's actions regarding the reissuance and remedy selection. The environmental assessments outline reasonable alternatives and any impacts to the human environment that may result from DEQ's actions.

## PUBLIC PARTICIPATION

The public comment period allows interested citizens, members of the regulated community, and other governmental agencies an opportunity to comment on the draft permit, Statement of Basis, and the environmental assessments.

### Comment Period

**The comment period extends from July 14 to August 27, 2014.**

### Written Comments

The public has until close of business on August 27, 2014 to submit written comments. Comments should include all reasonably available references, factual grounds for comments, and supporting material. Please submit written comments to the following address or email:

#### *U.S. Mail*

Becky Holmes  
DEQ Permitting and Compliance Division,  
Waste and Underground Tank Management Bureau  
P.O. Box 200901  
Helena, MT, 59620-0901

#### *Email*

[DEQhazwaste@mt.gov](mailto:DEQhazwaste@mt.gov)  
Subject Line – CHS Laurel Public Comment

### Public Hearing

A public hearing will be held if DEQ determines, based upon requests, there is a significant degree of public interest in the proposed permit reissuance and/or remedy selection. Requests for a public meeting may be submitted in writing to DEQ prior to the end of the comment period.

### Location of the Draft Permit, Statement of Basis, Fact Sheet, and Environmental Assessments

Copies of the draft permit, Statement of Basis, Fact Sheet, and Environmental Assessments are available for review at the Laurel Public Library and DEQ's Helena office. Supporting project documents for the Statement of Basis, including the human health and ecological risk assessment reports, and the Corrective Measures Study, are also available at those locations. All documents and correspondence related to facility cleanup at the Laurel Refinery are in DEQ's public record and may be reviewed at the DEQ Helena office.

Location Information	Review Hours
<b>Laurel Public Library</b> 720 West 3 <sup>rd</sup> Street PO Box 68 Laurel, MT 59044 (406)682-4961	Monday through Thursday 9 A.M. to 7:30 P.M. Saturday 9 A.M. to 3 P.M. <i>Closed Friday and Sunday</i>

Location Information	Review Hours
<b>Montana Department of Environmental Quality</b> Permitting and Compliance Division Waste and Underground Tank Management Bureau Metcalf Building 1520 E. 6th Ave. Helena, Montana (406) 444-5300	Monday through Friday 8:00 am - 5:00 pm  Websites: Fact Sheet, Draft Permit, Statement of Basis: <a href="http://deq.mt.gov/pubcom.mcpx">http://deq.mt.gov/pubcom.mcpx</a>  Draft Environmental Assessments <a href="http://deq.mt.gov/ea/WasteMgt.mcpx">http://deq.mt.gov/ea/WasteMgt.mcpx</a>

#### DEQ's Procedure for Reaching Final Decisions

DEQ will prepare a Response to Comments after reviewing all comments. The Response to Comments will explain any changes to the proposed permit and proposed remedy selection, and respond to any comments received during the comment period.

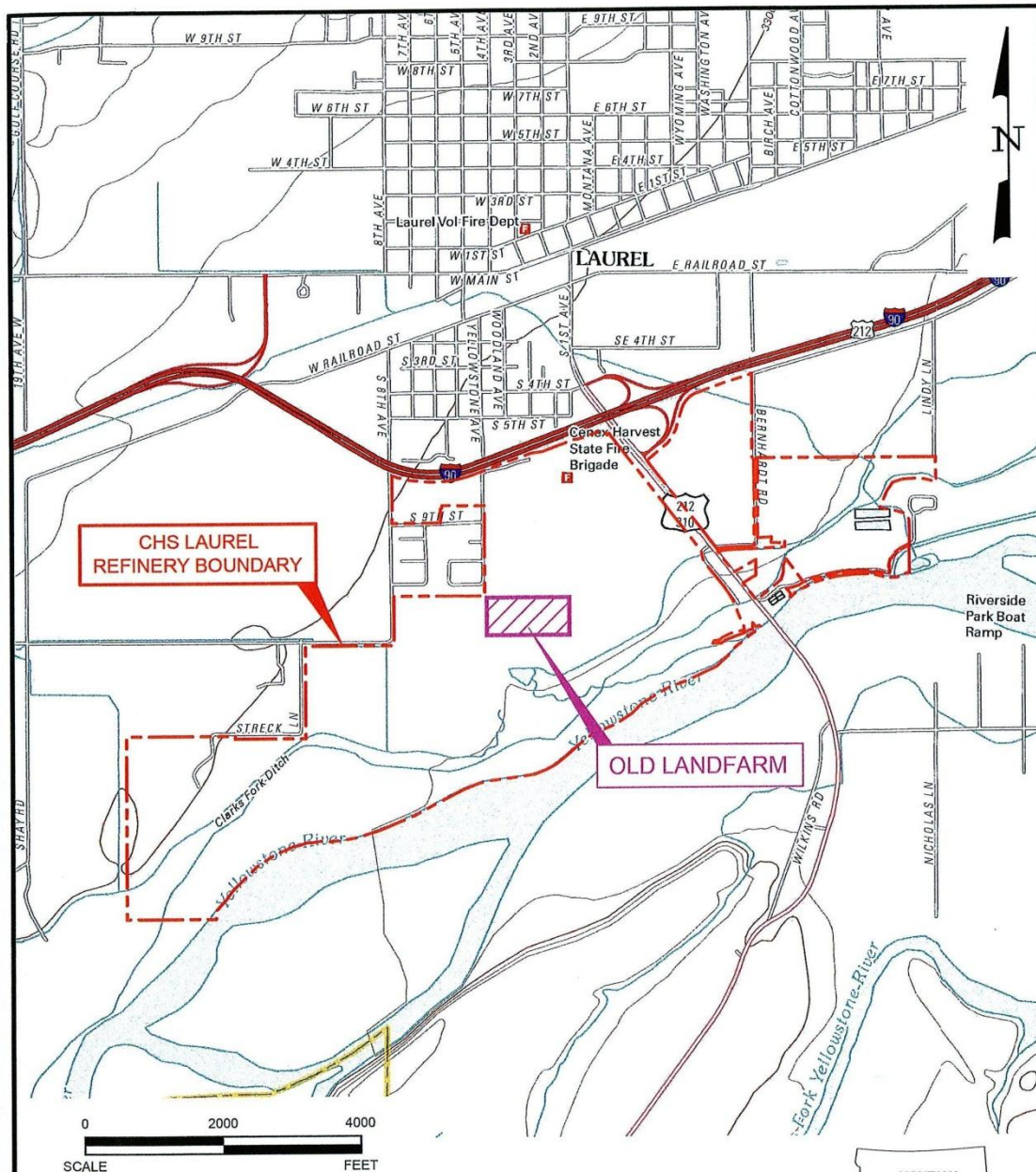
DEQ will then make a final decision to issue or deny the permit reissuance, and to select the remedy. After DEQ makes its final decisions, notice will be given to CHS and each person who submitted written comments or requested a notice of the final decisions. The final decisions become effective 30 days after notice of the decision, unless a later date is specified or a public hearing is requested under 40 CFR 124.11, as incorporated by ARM 17.53.1201. If no comments are received, the final permit becomes effective immediately upon notice of DEQ's final decision. The Statement of Basis will be incorporated into the final permit.

#### **FOR MORE INFORMATION**

If you need further information, please contact Becky Holmes at the address listed above, phone 406-444-2876, or email [rholfes@mt.gov](mailto:rholfes@mt.gov).

Dated July 9, 2014

**Figure 1**  
**CHS Laurel Refinery**



Note: The Old Landfarm (OLF) is the former RCRA Land Treatment Unit (LTU) currently in closure. The original LTU consisted of the OLF and adjacent New Landfarm (NLF) that was closed April 21, 2006. See Figure I-2 for configuration of the original LTU (OLF AND NLF).

SOURCE: U.S.G.S. 7.5 MINUTE QUADRANGLES FOR LAUREL, MT, 2011 AND MOSSMAIN, MT, 2011.

## Environmental Resources Management

DESIGN: RSC	DRAWN: CAK	CHKD: MLR
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SITE LOCATION MAP  
CHS Refinery  
Laurel, Montana

